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**VIA ECF**

The Honorable Mary Kay Vyskocil, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, New York 10007

Re: Penske Media Corp. v. Shutterstock, Inc., 20-cv-04583 (MKV)

Dear Judge Vyskocil:

We are counsel for defendant-counterclaim plaintiff Shutterstock, Inc. (“Shutterstock”) and submit this letter pursuant to Paragraph 9(B) of this Court’s Individual Rules of Practice in Civil Cases, the Court’s Standing Order 19-mc-00583, and ECF Rules & Instructions Section 6. Specifically, Shutterstock seeks the Court’s approval to publicly file redacted copies of its letter seeking permission to move for partial summary judgment (“Pre-Motion Letter”) and draft Rule 56.1 Statement of Undisputed Facts (“Draft Rule 56.1 Statement”), which each contain information that plaintiff-counterclaim defendant Penske Media Corporation (“PMC”) has designated as “Confidential” and/or “Attorneys’ Eyes Only” pursuant to the Protective Order. *See* Dkt. No. 72.

Shutterstock’s Pre-Motion Letter and Draft Rule 56.1 Statement each contain information from: (1) the “Photographic Services and Reciprocal Image License Agreement” between PMC’s subsidiary, Variety, Inc., and Getty Images (US), Inc.; (2) various email communications and documents produced by PMC; and (3) the transcripts of the depositions of several of PMC’s witnesses.<sup>1</sup> PMC has designated all of the foregoing material as “Confidential” and/or “Attorneys’ Eyes Only” pursuant to the Protective Order. Accordingly, Shutterstock respectfully requests that the Court approve its redacted filings.

Shutterstock has publicly filed the Pre-Motion Letter and Draft Rule 56.1 Statement with the proposed redactions, which are narrowly tailored to protect the above-described materials. Shutterstock has also electronically filed under seal copies of the unredacted Pre-Motion Letter and Draft Rule 56.1 Statement with the proposed redactions highlighted.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'EML', with a stylized flourish extending to the right.

Eleanor M. Lackman

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<sup>1</sup> The foregoing materials are specifically identified (*e.g.*, by Bates number) in Shutterstock’s Pre-Motion Letter and Draft Rule 56.1 Statement.